

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 8

1595 Wynkoop Street Denver, CO 80202-1129 Phone 800-227-8917 www.epa.gov/region08

MAY 1 8 2016

Ref: 8ENF-AT

<u>CERTIFIED MAIL</u> RETURN RECEIPT REQUESTED

Mr. Craig Rood, Site Manager Ciner Wyoming LLC 254 County Road 4-6 Green River, Wyoming 82935

Re: Follow-up Section 114(a) Information Request for the Ciner Wyoming LLC (formerly OCI Wyoming LLC), Big Island Mine and Refinery in Wyoming; Capital Projects Identified

Dear Mr. Rood:

On April 28, 2014, the United States Environmental Protection Agency sent a letter (2014 Letter) to OCI Wyoming L.P., now named Ciner Wyoming LLC (Ciner Wyoming), requesting information pursuant to section 114(a) of the Clean Air Act (the Act), 42 U.S.C. § 7414(a). The information request was to evaluate your soda ash facility's compliance with the Act's requirements regarding modifications performed on air emission units. Ciner Wyoming responded to the EPA's request for information on July 15, 2014.

Within the 2014 Letter, Request No. 5 of Enclosure 2 indicates that after the EPA received the list of projects identified in Request No. 3, the EPA will narrow the list of capital projects, send the narrowed list to Ciner Wyoming, and Ciner Wyoming will provide further detailed information as specified. With this second request for information, the EPA is providing a narrowed list of capital projects from the original list and is requesting Ciner Wyoming to provide the detailed information. In addition, the EPA is requesting clarifying information on specific units and updated information on the original data submitted. The narrowed list and additional information are found in Enclosure 1 of this letter.

Ciner Wyoming's response to the entirety of this request is due within thirty (30) days of receipt of this letter. Please submit your response to this request to:

U.S. Environmental Protection Agency, Region 8
Technical Enforcement Program
Office of Enforcement, Compliance and Environmental Justice
1595 Wynkoop Street
Denver, Colorado 80202-1129
Attention: Scott Whitmore (8ENF-AT)

This second request for information is considered to be an addendum to the 2014 Letter and is also made pursuant to section 114(a) of the Act, 42 U.S.C. § 7414(a). Please refer to the 2014 Letter for applicable instructions, definitions, certification requirements, and business confidentiality claim assertion and substantiation requirements.

It is important that Ciner Wyoming respond to this request for information. Failure to comply may result in administrative and civil penalties of up to \$37,500 per day of violation as provided by section 113(d) of the Act, 42 U.S.C. § 7413(d). Please be further advised that the submission of false, fictitious or fraudulent statements or representations may subject you to criminal penalties under section 113(c) of the Act, 42 U.S.C. §§ 1001 and 1341.

If you have any technical questions concerning this request, please contact Scott Whitmore of my staff at (303) 312-6317. Any questions from Ciner Wyoming's legal counsel, should be directed to Lauren Hammond, EPA Enforcement Attorney, at (303) 312-7081.

Sincerely,

Suzanne J. Bohan

Assistant Regional Administrator Office of Enforcement, Compliance and Environmental Justice

Enclosures:

- (1) List of narrowed capital projects and additional request for information
- (2) Statement of Certification

ce: Nancy Vehr, Wyoming Department of Environmental Quality Greg Fried, EPA-Headquarters

ENCLOSURE 1

List of Narrowed Capital Projects and Additional Information

1. The EPA has reviewed the list of capital projects provided by Ciner Wyoming in its response to the 2014 Letter. Please use the list of specific projects identified in the table below to respond to Request Number 5 of the 2014 Letter:

Project Name	Project Dates	
Calciner Unit 6 Construction	1997-1998	
Alternative Energy Project, GRV092004	2004 – 2007	
Capacity Enabler Projects, GRV172013 and BRV812012	2013 ongoing	

- 2. During the time period of the 2014 Letter, the Capacity Enabler Project was ongoing. Please provide updated information in response to all applicable requests in the 2014 Letter, including but not limited to post-project emissions data.
- 3. Provide a list which includes a description, specifications, and the history of all calciners that existed at the site. Indicate the current operational status of each, the date that its operation commenced, the date when each was retired from service, and any periods of time when each was out-of-service for an extended period of time. In addition, provide the following:
 - a) An explanation as to why there is soda ash output data for Calciner Units 3, 4, and 5 after ore feed and heat input data dropped to zero between 2007 and 2009; and
 - b) An explanation as to why in the original information submitted, Ciner Wyoming reported the same values of ore feed and calcined materials discharged for Calciner Units 6 and 7 from February 2009 onward. Likewise, provide an explanation why Ciner Wyoming reported zero tons per month for the entire time period Calciner Unit 7 was operating.
- 4. Provide updated data for Request Numbers 6, 7, and 8 since the original request of April 28, 2014, to the present.
- 5. Describe all VOC and HAP measurements that have been performed at the facility since 1994. Describe how Ciner Wyoming measures and calculates VOCs and HAPs when providing the WAQD with Annual Emissions Inventory information.
- 6. Provide an update to the list in Request Number 3 of the original information request for all capital projects that have been performed since April 28, 2014, to present.

			ı [;]
	•		
		٠.	
	•		
•			